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*Attorneys for Defendant
Wal-Mart Stores, Inc.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DANIELLE JORGENSEN and EBODIO
MENDOZA,

Plaintiff,

v.

WAL-MART STORES, INC., a Delaware
corporation, dba WAL-MART STORE #2837;
DOES EMPLOYEES I through X; and ROE
CORPORATIONS XI through XX,

Defendants.

Case No.: 2:15-CV-00198-RFB-PAL

**STIPULATION AND [PROPOSED]
ORDER TO CONDUCT THE
DEPOSITION OF DR. MARJORIE
BELSKY AFTER THE CLOSE OF
DISCOVERY**

COMES NOW, Defendant WAL-MART STORES, INC. (“Walmart”), by and through its counsel of record, the law firm of PHILLIPS, SPALLAS & ANGSTADT LLC, and Plaintiffs DANIELLE JORGENSEN AND EBODIO MENDOZA (“Plaintiffs”), by and through their counsel of record, ADAM WAX, ESQ. of WAX LAW and RYAN ANDERSEN of ANDERSEN LAW FIRM, LTD., and hereby stipulate to allow the parties to conduct the deposition of Dr. Marjorie Belsky after the close of discovery.

The parties stipulate, pending this Court’s approval, that Walmart shall have leave to depose Plaintiff Danielle Jorgensen’s treating physician Dr. Marjorie Belsky after the close of discovery. The parties aver, pursuant to Local Rule 6-1, that good cause exists for the requested leave. Walmart has acted diligently to arrange Plaintiff’s treating physician’s deposition prior to the close of discovery;

1 however, given her professional obligations, Plaintiff's treating physician's deposition could not be
 2 scheduled within the discovery period. Plaintiff's treating physician's deposition has been scheduled
 3 for September 8, 2015. The parties have diligently sought to conduct this deposition within the
 4 discovery period, but Dr. Marjorie Belsky's stated availability necessitated scheduling outside the
 5 discovery period.
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7 The parties therefore respectfully request that the parties be granted leave to conduct Dr.
 8 Marjorie Belsky's deposition outside the close of discovery. The parties aver that this request is made
 9 in good faith and not for the purpose of delay.
 10

11 DATED this 8th day of July, 2015

DATED this 8th day of July, 2015.

12
 13 /s/ Adam Wax
 Adam Wax, Esq.
 WAX LAW
 14 400 South Fourth Street, Suite 500
 15 Las Vegas, NV 89101

/s/ Amtoj S. Randhawa
 Amtoj S. Randhawa, Esq.
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16 *Attorneys for Plaintiffs*

*Attorneys for Defendant
 Wal-Mart Stores, Inc.*

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 20 **ORDER**

21 **IT IS SO ORDERED.**

22 DATED on this 14th day of July, 2015.
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25 **UNITED STATES MAGISTRATE JUDGE**
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